

FILED 10 JAN '23 13:16 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

3:23-cr-00008-MO

UNITED STATES OF AMERICA

INDICTMENT

v.

21 U.S.C. § 841(a)(1), (b)(1)(C)

ALEXANDER BRUCE LEAKE,

FORFEITURE ALLEGATIONS

Defendant.

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

**(Possession with Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(C))**

On or about September 19, 2022, in the District of Oregon, **ALEXANDER BRUCE LEAKE** did unlawfully and knowingly possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FIRST FORFEITURE ALLEGATION

Upon conviction for the offense alleged Count One of this indictment, defendant **ALEXANDER BRUCE LEAKE** shall forfeit to the United States, pursuant to Title 18 United States Code, Sections 982(a)(2)(B), any property constituting, or derived from proceeds obtained directly or indirectly as a result of said offenses. In addition, pursuant to Title 18, United States Code, Sections 1028(b)(5), defendant **ALEXANDER BRUCE LEAKE** shall forfeit to the

United States any personal property used or intended to be used to commit said offenses, including, a Smith & Wesson M&P-15 .223 caliber rifle (bearing serial number TN95257), and a sawed-off Maverick Arms 20-gauge shotgun (bearing serial number MV0064955), and any associated ammunition.

SECOND FORFEITURE ALLEGATION

Upon conviction of the controlled substance offense alleged in Count One of this Indictment, defendants shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

SUBSTITUTE ASSETS

If any forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

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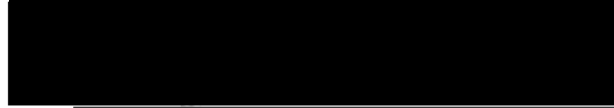
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it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

Dated: January 10, 2023


A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney



PAUL T. MALONEY, OSB #013366
Assistant United States Attorney